

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DONALD BEASLEY, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TELETECH HOLDINGS, INC., KENNETH D.
TUCHMAN, JOHN R. TROKA, RUTH C.
LIPPER, SHIRLEY YOUNG, WILLIAM A.
LINNENBRINGER, JAMES E. BARLETT,
SHRIKANT MEHTA, CITIGROUP GLOBAL
MARKETS INC., MORGAN STANLEY & CO.,
INC, and ERNST & YOUNG, LLP,

Defendants.

CASE NUMBER: 08-CV-00913

**JUDGE LAURA TAYLOR
SWAIN**

WILLIAM BROWN, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TELETECH HOLDINGS, INC., KENNETH D.
TUCHMAN, JOHN R. TROKA, RUTH C.
LIPPER, SHIRLEY YOUNG, WILLIAM A.
LINNENBRINGER, JAMES E. BARLETT,
SHRIKANT MEHTA, CITIGROUP GLOBAL
MARKETS INC., MORGAN STANLEY & CO.,
INC, MERRILL LYNCH & CO., CREDIT
SUISSE and ERNST & YOUNG, LLP,

Defendants.

CASE NUMBER: 08-CV-01842

**JUDGE LAURA TAYLOR
SWAIN**

**MOTION OF DONALD BEASLEY AND PAPRAJ SUDHAKAR TO CONSOLIDATE
RELATED ACTIONS; TO BE APPOINTED LEAD PLAINTIFFS; AND TO APPROVE
PROPOSED LEAD PLAINTIFFS' CHOICE OF COUNSEL**

Donald Beasley and Papraj Sudhakar (“Beasley and Sudhakar” or “Movants”) respectfully move this Court for an order: (1) consolidating all related actions; (2) appointing Movants as Lead Plaintiffs in this action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 and Section 27(a)(3)(B) of the Securities Act of 1933, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (3) approving their selection of the law firm of Kahn Gauthier Swick, LLC, as Lead Counsel for the Class.

Beasley and Sudhakar make this Motion on the belief that they are the most “adequate plaintiffs” as defined in the PSLRA because:

1. they have the largest financial interest in the relief sought by the Class and have incurred substantial losses in the amount of \$36,006.93 as a result of their purchases of TeleTech Holdings, Inc. stock during the Class Period, and
2. they satisfy the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

Beasley and Sudhakar further request that the Court approve the selection of their counsel, Kahn Gauthier Swick, LLC, (“KGS”), as Lead Counsel for the Class. This firm has actively investigated the allegations raised against Defendants. KGS is a nationally-recognized law firm with significant class action, fraud, and complex litigation experience, and—as evidenced by the investigation KGS has undertaken as reflected in the first-filed complaint KGS prepared and filed on behalf of its client, is a firm with the resources to effectively and properly pursue this action.

WHEREFORE, for all of the reasons set forth herein and in the Memorandum of Law and the Miller Declaration submitted herewith, Beasley and Sudhakar respectfully request that this Court: (1) consolidate all related actions with the instant case; (2) appoint Beasley and Sudhakar as Lead Plaintiffs pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 and Section 27(a)(3)(B) of the Securities Act of 1933, as amended by the PSLRA; (3)

approve Beasley and Sudhakar's selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: March 25, 2008

Respectfully submitted,

KAHN GAUTHIER SWICK, LLC

/s/ Kim E. Miller

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KAHN GAUTHIER SWICK, LLC

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*Counsel for Beasley and Sudhakar and
Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 25, 2008.

/s/ Kim E. Miller
Kim E. Miller

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CASE NUMBER: 08-CV-01842

**JUDGE LAURA TAYLOR
SWAIN**

**[PROPOSED] ORDER CONSOLIDATING RELATED ACTIONS; APPOINTING LEAD
PLAINTIFFS; AND APPROVING PROPOSED LEAD PLAINTIFFS' CHOICE OF
COUNSEL**

Having considered the motion of Donald Beasley and Papraj Sudhakar to consolidate all related cases, to be appointed Lead Plaintiffs, and to approve proposed Lead Plaintiffs' choice of counsel, and all papers in support thereof and in opposition thereto, and oral argument, if any, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. Donald Beasley and Papraj Sudhakar are hereby appointed Lead Plaintiffs for the Class pursuant to Section Section 21D of the Securities Exchange Act of 1934 and 27(a) of the Securities Act of 1933; and
3. The law firm of Kahn Gauthier Swick, LLC is hereby appointed Lead Counsel for Lead Plaintiffs and the Class.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE